

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ESPERANZA DE LA CRUZ

DEBTOR

CASE NO. 18-05846/MCF

CHAPTER 13

**DEBTOR'S MOTION IN COMPLIANCE WITH ORDER, DOCKET NO 63,
AND REQUEST FOR ADDITIONAL EXTENSION OF TIME**

TO THE HONORABLE COURT:

NOW COMES, ESPERANZA DE LA CRUZ, Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. Before the Court there is a *Trustee's Motion to Dismiss*, Docket No. 61, and *Motion Requesting Extension of Time to Reply to Motion to Dismiss*, Docket No 62.

2. On August 16, 2021, this Honorable Court granted the Debtor thirty (30) days to file evidence of being current. *ORDER*, Docket No. 63.

3. The Debtor hereby respectfully informs the Court that on August 23, 2021, she made one (1) \$984.00 partial payment to the Trustee (money order no 27513835536), registered with the Trustee on September 8, 2021. Attached is copy of *Trustee's Financial Summary* as evidence of said payment made to the Trustee.

4. However, the Debtor respectfully states that she [the Debtor] has been unable to cure the balance in the Plan arrears within the period of time granted by the Court for the reason that she has had to incur in certain extraordinary expenses due to her medical/health condition.

5. The Debtor respectfully submits to this Honorable Court that on September 29, 2021, she will pay the current balance owed in arrears in the amount of \$656.00, to cure any and all confirmed Plan payment arrears.

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6. Therefore, the Debtor respectfully requests an additional fourteen (21) days in order to make the required payment, file evidence of curing the Plan arrears, which extension of time to expire on October 06, 2021.

WHEREFORE, the Debtor requests this Honorable Court grant the present motion in compliance with ORDER, Docket No. 63, and grant the requested additional extension of time, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to the CM/ECF participants, including the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor to her address of record.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 15th day of September, 2021.

/s/ Roberto Figueroa Carrasquillo
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USDC #203614
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FINANCIAL SUMMARY - CASE 18-05846

ESPERANZA DE LA CRUZ paying **\$328.00** MONTHLY

Receipts	Rcpts/Deb Refunds	Disbursements	Adjustments	Trustee Disb	Trustee Adj	Show All
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Limits: Check Status:

Date	Payee	Payee Name	Source / Check	Description	Receipts	Disbursements	Balance
9/8/2021			000000000005536	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$984.00		
8/9/2021			000000000003952	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$328.00		
5/4/2021			000000000006398	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$656.00		
1/11/2021			000000000001383	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$328.00		
12/14/2020			000000000009112	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$328.00		
10/22/2020			000000000008016	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
9/28/2020			000000000005092	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
9/16/2020			000000000003686	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
8/17/2020			000000000003173	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
6/30/2020			000000000005207	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$860.00		
3/6/2020			000000000004650	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
3/5/2020			000000000000972	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
3/5/2020			000000000005655	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
1/24/2020			000000000006890	LOCKBOX CORRECTIONS FTB	\$430.00		
12/23/2019			000000000006821	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$860.00		
12/6/2019			000000000004986	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
11/25/2019			000000000002247	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$860.00		
7/25/2019			000000000001168	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
6/24/2019			000000000006918	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
5/14/2019			000000000003876	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
3/26/2019			000000000004153	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
3/26/2019			000000000000261	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
2/11/2019			000000000000672	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
12/10/2018			000000000003143	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
11/2/2018			000000000003486	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$430.00		
Totals:					\$12,514.00	\$0.00	